

EXHIBIT 11

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH
CENTRAL DIVISION

JOSHUA CHATWIN,

Plaintiff,

V.

Civil No. 2:14-cv-00375

DRAPER CITY; DRAPER CITY
POLICE DEPARTMENT; POLICE
CHIEF MAC CONNOLE; OFFICER
J. PATTERSON, in his
individual and official
capacity; OFFICER DAVID
HARRIS, in his individual
and official capacity;
OFFICER HEATHER BAUGH, in
her individual and official
capacity; and JOHN DOES 1-10,

Defendants.

DEPOSITION OF: MEHDI MAHMOUDI
DATE: November 20, 2015

Reported by: Donna M. Ward, CSR, RPR

Intermountain Court Reporters
Murray, UT 84107
(801) 263-1396



1 describes different kinds of documents; correct?

2 A. Uh-huh.

3 Q. Do you happened to have any of those
4 documents to your knowledge?

5 A. No.

6 Q. Okay, so when you received this, you didn't
7 actually read it; correct?

8 A. No.

9 Q. But after having reading it, do you think
10 that you would have any documents that would be relevant
11 to this stuff listed here?

12 A. No, I don't.

13 Q. Okay, so do you remember on May 18th, 2010,
14 witnessing some events in your neighborhood?

15 A. I witnessed partially, yes.

16 Q. Okay, so what I'd like you to do for me, if
17 you don't mind, just kind of -- if you could from start
18 to finish tell me the story of what you witnessed that
19 day.

20 A. Okay. I was going home and I had a flat
21 tire. I had a van and I was changing tires with the
22 spare tire and then I -- all of a sudden, I heard a
23 noise, so I looked around and saw a man lay down face
24 down on the ground and I saw I believe three police
25 officers around standing there, and it was a matter of a